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March 12, 2008

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The Honorable Charles L. Brieant, U.S.D.J.  
United States District Court for the Southern District of New York  
Attn: Alice Cama

Re: NGM Insurance Company v. Blakely Pumping et al.  
Docket No. 07-CV-6517  
Our File: NGM-1281

**MEMO ENCLOSED**  
*Applied*  
*Ordered*  
*3-17-08*  
*L. Brieant*  
*u 505*

Dear Honorable Sir:

We write as counsel to plaintiff, National Grange Mutual Insurance Company with respect to the above referenced declaratory judgment action.

Pursuant to the case scheduling Order, plaintiff is to file any dispositive motions by this Friday, March 14, 2008, returnable on April 18, 2008. The party depositions were completed recently, however, I became engaged on trial in Nassau County, on a matter entitled, Sisino v. Island Motocross, et al., under Index No. 1684/03. As such, I will not be able to file our motion by the March 14, 2008 deadline.

Accordingly, it is respectfully requested that plaintiff be granted a two-week extension to March 28, 2008 to file a motion which would be returnable on May 2, 2008. All parties have consented to the within application.

We thank you for your attention in this matter and should you have any questions, please feel free to contact the undersigned.

Very truly yours,

**BRILL & ASSOCIATES, P.C.**

By: /s/ Haydn J. Brill  
Haydn J. Brill

HJB/cr

cc

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